BAGGETT, McCALL, BURGESS WATSON & GAUGHAN, L.L.C.



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February 14, 2018

Freedom of Information Act Officer U.S. EPA 401 M Street, SW Washington, D.C. 20460



Dear EPA FOIA Officer:

Baggett, McCall, Burgess, and Watson requests, pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552, a copy of the "confidential statement of formula" (EPA Form 8570-4) for the following chemical:

Chemical name: Alkylphenol

ID#: UN3286

Hazard class: 3-Flam/Combust Liquid.

We are particularly-interested in getting a complete disclosure of the identifications and quantities of any and all "inert ingredients."

FOIA specifies that if some portions of the documents are exempt, you must segregate those portions and give us the rest of the document. If you review any document that fits the request but decide to withhold it in whole or part, please include a list of all non-released documents. In addition, if you withhold any information on the basis of business confidentiality, please provide documentation for your determination that the substantive criteria set forth in C.F.R. 2.208 have been met.

I am prepared to bear the costs of processing this request, but would appreciate an estimate of the costs prior to incurring them. I would also like to request a waiver of the costs based upon public interest. I am making this request on behalf of my client who has pending litigation. Neither I, nor my client, have any "commercial" purpose for requesting this data. The requested data may be used in the litigation process and neither this firm, nor our clients, will charge or receive fees for those documents outside of the customary copying charges.

We look forward to receiving your response within the ten days required by the Freedom of Information Act.

Sincerely.

CHRISTOPHER C. McCALL

BAGGETT, McCALL, BURGESS, WATSON & GAUGHAN, LLC

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